



BellSouth Telecommunications, Inc.
Legal Department
1600 Williams Street
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Columbia, SC 29201

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Patrick W. Turner
General Counsel-South Carolina

803 401 2900
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February 22, 2005

Mr. Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

RECEIVED
2005 FEB 22 PM 3:05
SC PUBLIC SERVICE
COMMISSION

Re: Generic Proceeding to Address the Appropriate Rate Classification or Rate
Structure for Telephone Lines Located in Elevators and for Telephone Lines
Located in Proximity to Swimming Pools
Docket No. 2005-15-C

Dear Mr. Terreni:

Enclosed for filing are an original and ten copies of BellSouth Telecommunications
Inc.'s Petition to Intervene in the above-referenced matter.

By copy of this letter, I am serving all parties of record with a copy of this Petition as
indicated on the attached Certificate of Service.

Sincerely,

Patrick W. Turner

PWT/nml
Enclosure
cc: All Parties of Record
PC Docs #573489

RETURN DATE: OK
SERVICE: OK

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NO. 2005-15-C

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SC PUBLIC SERVICE
COMMISSION

IN RE:)
)
Generic Proceeding to Address the) PETITION TO INTERVENE
Appropriate Rate Classification or Rate)
Structure for Telephone Lines Located in)
Elevators and for Telephone Lines Located)
In Proximity to Swimming Pools)
_____)

Pursuant to S. C. Code Regs. 103-836 and in compliance with the Revised Notice of Filing and Hearing ("Revised Notice") issued on January 31, 2005, BellSouth Telecommunications, Inc. ("BellSouth") respectfully petitions the Public Service Commission of South Carolina ("the Commission") for permission to intervene as a formal party of record in the above-captioned proceeding. In support of this Petition, BellSouth shows as follows:

1. BellSouth is a public utility presently providing comprehensive telecommunications services to its subscribers pursuant to intrastate tariffs approved by the Commission.

2. BellSouth's authorized representative in this proceeding is:

Patrick W. Turner
BellSouth Telecommunications, Inc.
1600 Williams Street, Suite 5200
Columbia, South Carolina 29201
Telephone: (803) 401-2900
Facsimile: (803) 254-1731

3. The Revised Notice states that "a generic proceeding should be established to address the appropriate rate classification or rate structure for telephone lines located in elevators and for telephone lines located in proximity to swimming pools. The Revised Notice directs persons who wish to participate in this matter as a party of record with the right of cross-examination to file a Petition to Intervene on or before February 22, 2005.

4. BellSouth has an interest in this proceeding and could be affected by the Commission's rulings in this docket because BellSouth provides telephone lines located in certain elevators and telephone lines located in proximity to certain swimming pools.

5. BellSouth has not yet fully developed its position in this proceeding.

6. Granting BellSouth's Petition will not cause any undue delay.

7. BellSouth reserves the right to testify and present evidence at the hearing.

At this time, BellSouth does not believe that it would require more than an hour for such presentation.

WHEREFORE, based on the foregoing, BellSouth requests the following relief:


1. that it be allowed to intervene as a formal party of record in this proceeding by this Commission's granting its Petition to Intervene;

2. that any parties of record be directed to provide BellSouth with a copy of any pleadings, testimony and exhibits or any other filings made in this proceeding; and

3. that the Commission grant such other relief as it deems just and proper.

This 22nd day of February, 2005.

Respectfully submitted,

A handwritten signature in black ink that reads "Patrick Turner". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

Patrick W. Turner
1600 Williams Street, Suite 5200
Columbia, South Carolina 29201
(803) 401-2900

ATTORNEY FOR BELL SOUTH
TELECOMMUNICATIONS, INC.

STATE OF SOUTH CAROLINA

)

)

COUNTY OF RICHLAND

)

CERTIFICATE OF SERVICE

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused the BellSouth Telecommunications, Inc.'s Petition to Intervene in Docket No. 2005-15-C to be served upon the following this February 22, 2005:

Florence P. Belser, Esquire
General Counsel
Office of Regulatory Staff
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F. David Butler, Esquire
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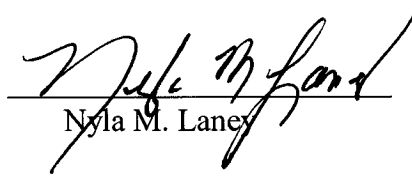
Rufus S. Watson, Jr.
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4700 Touchey Drive #7
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Nyla M. Laney

PC Docs # 573490